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Attorneys for Defendants Kaiser Foundation
 Health Plan, Inc., Kaiser Foundation Hospitals,
 and The Permanente Medical Group, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

DEBORAH CLAY, an individual and as the)	No. C06-07926 SI
Successor in Interest to the Estate of RODNEY)	
CLAY; RODNEY KEITH CLAY, JR.; VELICIA)	
HAMILTON; TAMIKO MOON; and)	JOINDER OF THE PERMANENTE
THOMASINA CLAY,)	MEDICAL GROUP, INC. IN
)	DEFENDANTS' MOTION TO COMPEL
Plaintiffs,)	ARBITRATION
)	
v.)	Date: April 27, 2007
)	Time: 9:00 a.m.
THE PERMANENTE MEDICAL GROUP, INC.;)	Dept.: 10
KAISER FOUNDATION HOSPITALS, KAISER)	Courtroom: The Hon. Susan Illston
FOUNDATION HEALTH PLAN, and DOES 1)	
through 200, inclusive,)	
)	
Defendants.)	

JOINDER IN MOTION TO COMPEL ARBITRATION – C06-07926 SI

1 TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that defendant The Permanente Medical Group, Inc. joins in
3 the motion to compel arbitration filed on March 15, 2007 by Kaiser Foundation Health Plan, Inc.
4 and Kaiser Foundation Hospitals. The motion is set to be heard on April 27, 2007 at 9:00 a.m. in
5 Department 10 located at 450 Golden Gate Avenue, San Francisco, California.

6 The motion to compel arbitration is made under the Federal Arbitration Act ("FAA"), 9
7 U.S.C. § 2, on the grounds that the arbitration provision in the member's agreement is governed
8 by the FAA, that the parties have agreed to submit their claims to final and binding arbitration,
9 that plaintiffs refuse to arbitrate this dispute, and that the right to compel arbitration has not been
10 waived. The motion to stay the litigation pending arbitration is made under 9 U.S.C. § 3 on the
11 ground that the entire lawsuit (with the exception of the public injunction claim) is subject to
12 arbitration, and the entire action should be stayed pending the arbitration.

13 The motion is based on this notice, the memorandum of points and authorities and the
14 declarations of James H. Simpson, III, Katherine Dean, Ronald R. Lamb, and Jason Hall filed by
15 Kaiser Foundation Hospitals and Kaiser Foundation Health Plan, Inc., the files and records of
16 this action, and such argument and evidence as may be presented at the hearing of this matter.

17
18 Dated: March 15, 2007

RONALD R. LAMB
WILKE, FLEURY, HOFFELT, GOULD & BIRNEY, LLP

KENNEDY P. RICHARDSON
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22
23 By s/s _____

24 Yvonne M. Pierrou

25 Attorneys for Kaiser Foundation Health Plan, Inc., The
26 Permanente Medical Group, Inc., and Kaiser Foundation
27 Hospitals

28 JOINDER IN MOTION TO COMPEL ARBITRATION – C06-07926 SI